



BP Cherry Point Refinery
4519 Grandview Road
Blaine, Washington 98230
Telephone 360 371-1500

April 15, 2003

Mr. Allen Fiksdal
Manager, Energy Facility Site Evaluation Council
925 Plum Street SE, Building 4
P.O. Box 43172
Olympia, Washington 98504-3172

Re: Revisions to the BP Cherry Point Cogeneration Project
Application for Site Certification, No. 2002-01

Dear Mr. Fiksdal,

BP West Coast Products, LLC (BP) is pleased to submit revisions to the Application for Site Certification for the BP Cherry Point Cogeneration Project (the Application).

BP has made changes to the proposed project since filing the Application in June 2002. The most significant of these changes concerns the system for heat dissipation. The original Application proposed to use an air-cooled condenser, but also mentioned BP was exploring the possibility of using recycled industrial water in a water-cooled system. BP is pleased to have reached a letter agreement earlier this year with Whatcom County Public Utility District No. 1 (PUD) and Alcoa about the reuse of water used for once-through cooling at Alcoa's nearby aluminum smelter.

Under the terms of the agreement, Alcoa would return approximately 4 million gallons of non-contact, once-through cooling water a day to the PUD, which the PUD would then provide to the Cogeneration Project for use in water-cooled condenser. On average, Alcoa will return more water to the PUD than will be used by the Cogeneration Project, and the additional recycled water will be used at the BP Refinery. This recycling opportunity allows the Cogeneration Project to operate more efficiently while reducing the demand for fresh water from the Nooksack River.

The proposed change from an air-cooled system to a water-cooled system has required numerous revisions in the Application. While making these revisions, BP has also updated the Application to reflect the latest project design assumptions. In addition to changes in the project description, BP updated the water use and water quality analysis, reran the air quality modeling, and reevaluated the noise impacts of the project. The Application Revisions also incorporate the changes provided in the "errata" submitted to the Council in September 2002.

Application Revision Packet

After consultation with the Council's staff, BP has assembled a packet of Application Revisions designed to make it relatively easy for the reader to understand the changes to the Application while, at the same time, minimizing duplication of materials unchanged from the original Application. Changes from the original Application are generally "redlined" or shown with



deletions crossed out and additions underlined. In some instances, tables have been provided with new information and clearly labeled "Revised" rather than shown using redlined text, because redlined text made the tables too difficult to read.

In most cases, the Application Revision packet contains entirely new sections of text intended to replace the existing sections of text. In a few instances, when only a small number of changes were made, the packet contains replacement pages rather than entirely new sections of text. Individual replacement tables and figures are provided where necessary.

Attached to this cover letter is a complete guide to the Application Revisions packet. The guide explains which parts of the original Application should be retained and which parts should be replaced or removed. BP is also providing all recipients with an additional 3-ring binder to hold the additional volume of material.

EFSEC Review Process

BP has been working with EFSEC on the Cogeneration Project since March 2001. After consultation with Council members and staff, BP decided participate in the voluntary Potential Site Study process outlined in WAC chapter 463-22. BP understood that this process would facilitate the early involvement of stakeholders, and that the process would ultimately result in a more streamlined review of the Application by EFSEC. BP appreciates the efforts of the Council and its staff and consultants to review the Application in a timely manner.

Although RCW 80.50.100 normally requires EFSEC to make a decision regarding an application within twelve months of its submission, BP realizes the submission of these revisions will delay the certification process from its original targeted completion date of June 2003. However, BP is confident that an entire additional twelve months will not be necessary. Since the commercial viability of the project likely depends on EFSEC reaching a decision by the end of 2003, BP is hopeful that the Council will move the Application to a decision as quickly as possible.

In an effort to minimize any delay with the Application Revisions, BP has kept the Council's consultant, Shapiro Associates, informed about the changes in the project and has provided much of the new technical information to Shapiro in advance of distributing the Revisions in hard copy form. BP has also taken care to present revisions to the Application in a form and format that will simplify their incorporation into the DEIS.

Changes reflected in the Application Revisions will improve the Cogeneration Project's efficiency while reducing potential impacts to the surrounding environment. We look forward to continuing to work with the Council, its staff and its consultants in the certification process. Please do not hesitate to call me (360- 371-1200) or Mike Torpey (360-371-1757) if you have any questions.

Sincerely,

Mark S. Moore
Project Manager
BP Cherry Point Cogeneration Project